

LDM
F. #2021R00923

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

24-CR-329 (ARR)

ELIAHOU PALDIEL and
CARLOS ARTURO SUAREZ PALACIOS,

Defendants.

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The United States of America, by and through BREON PEACE, United States Attorney for the Eastern District of New York, and Laura D. Mantell, Assistant United States Attorney, hereby files, pursuant to Federal Rule of Criminal Procedure 32.2(a), the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c), in connection with Counts One and Two of the Indictment. The United States hereby gives notice to the defendants that the United States also seeks forfeiture of the following property:

- (i) the real property and premises at 659 Hawks Nest Road, Brick, New Jersey 08724, together with its appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto;
- (ii) the real property and premises at 8 Crestwood Mews, Apartment 1D, Allendale, New Jersey 07401, together with its appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto;

- (iii) the real property and premises at 116-24 Grosvenor Lane, Apartment 5A, Kew Gardens, New York 11418, together with its appurtenances, improvements, fixtures, easements, furnishings and attachments thereon, as well as all leases, rents and profits therefrom, and all proceeds traceable thereto;
- (iv) \$36,601.35, more or less, seized by law enforcement on or about September 6, 2024, from TD Bank account number ending in 4360, held in the name or for the benefit of Eliahou Paldiel, and all proceeds traceable thereto;
- (v) \$78,801.14, more or less, seized by law enforcement on or about September 6, 2024, from TD Bank account number ending in 3128, held in the name or for the benefit of Carlos Suarez, and all proceeds traceable thereto;
- (vi) any and all funds, securities and other assets seized or restrained by law enforcement on or about September 6, 2024, in TD Ameritrade, Inc. account number ending in 2312, held in the name or for the benefit of Eliahou Paldiel, and all proceeds traceable thereto; and
- (vii) \$314,238.17, more or less, seized by law enforcement on or about September 6, 2024, from Robinhood Markets, Inc. account number ending in 0016, held in the name or for the benefit of Eliahou Paldiel, and all proceeds traceable thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
September 17, 2024

BREON PEACE
United States Attorney
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By: Laura D. Mantell
Laura D. Mantell
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To: All Counsel of Record (by ECF)